

January 26, 2006

## VIA OVERNIGHT DELIVERY

The Honorable Kevin Martin Chairman Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: IP-Enabled Services, WC Docket No. 04-36

E911 Requirements for IP-Enabled Service Providers WC Docket No. 05-196

## Dear Chairman Martin:

I am writing to update you on Vonage's progress in deploying a nationwide, nomadic E-911 network.

Vonage America, Inc. is committed to providing full E-911 capability to all of our customers as soon as possible. With the help of the FCC's aggressive deadline, today nearly every Vonage customer has access to the native 911 network. Additionally, since November 28, 2005 (the date of the Commission's VoIP E-911 Order), Vonage has almost doubled the number of customers with E-911, delivering that capability to 46.8% of our subscribers.

We are pleased with this progress, but aim for an even faster deployment for our customers. Accordingly, we reiterate our support for the North American's Numbering Council's recommendation that an interim administrator be appointed to coordinate the use of pseudo Automatic Number Identification (p-ANI). As advocated by public safety, the appointment of the p-ANI administrator would immediately quicken VoIP E-911 rollout.

Unlike the experience of wireless E-911—where PSAPs affirmatively request E-911 data when they are capable of receiving it—VoIP providers are sending E-911 data without any affirmative request from PSAPs. This fact, coupled with a compressed time frame, is helping to ensure a rapid rollout, but has also created logistical challenges that we are working diligently to overcome.



Lastly, we continue trying to accelerate our deployment by communicating regularly with all the stakeholders in our nation's public safety system. To facilitate the best possible project management, we reached out to the governors and state 911 coordinators of all 50 states, providing them status updates for their states, and requesting they assume a proactive posture in helping to deploy E-911 for their citizens. In those letters, we were also clear that Vonage is ready and willing to contribute financially to their states' 911 systems.

This is an exciting time for Vonage. We are making rapid progress, and with the help of the Commission are well on our way to the fastest E-911 deployment in the history of 911.

Sincerely,

Jeffrey A. Citron Chairman and CEO

Vonage Holdings Corp.

Cc: FCC Commissioner Deborah Tate

FCC Commissioner Michael J. Copps

FCC Commissioner Jonathan S. Adelstein